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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of

Redevelopment of Spectrum to
 Encourage Innovation in the
 Use of New Telecommunications
 Technologies

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ET Docket No. 92-9

RM-7981

RM-8004

To: The Commission

COMMENTS ON ALCATEL COMPROMISE PLAN

Alcatel Network Systems, Inc. ("ANS"), by its attorneys, hereby submits comments regarding its May 20, 1993, Compromise Plan for the channelization proposal by the Commission in the above-captioned Further Notice of Proposed Rule Making, 7 FCC Rcd 6100 (1992) ("FNPRM").¹ In the FNPRM, the Commission proposes rules for how 2 GHz fixed point-to-point microwave users, displaced to clear spectrum for personal communications services, will operate in the bands above 3 GHz. A 1.6 MHz based channelization is proposed by the Commission in the FNPRM.²

Under its Compromise Plan, ANS proposes adoption of a 2.5 MHz based channelization advocated by other microwave equipment manufacturers.³ TIA will be filing comments essentially in favor of adopting the Compromise Plan. ANS generally supports TIA's comments on the Compromise Plan. ANS does request that the Commission fully consider adopting the following

¹ In a Public Notice (DA 93-603, released May 28, 1993), the Commission invited comments on ANS' Compromise Plan.

² Based upon industry suggestions, ANS submitted proposed improvements to this channel plan. Alcatel Network Systems, Inc., Reply Comments, ET Docket No. 92-9, January 26, 1993, Technical Staff Report.

³ Joint Comments of Harris Corporation-Farion Division, Digital Microwave Corporation and TeleSciences, Inc., ET Docket No. 92-9, December 11, 1992, and Comments by The Telecommunications Industry Association Fixed Point to Point Communication Section ("TIA"), ET Docket No. 92-9, December 11, 1992.

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proposals, which are contained in the Compromise Plan, because they are user, rather than manufacturer, issues:

- * Prescribing minimum channel loading requirements for 10 MHz and greater bandwidth channels and prescribing deadlines for meeting such loading requirements; and
- * Requiring use of 2 DS-3 versus 3 DS-3 minimum equipment capacity in 30 MHz bandwidth channels in the 6 GHz band.

ANS appreciates the efforts of TIA and its members in working together to resolve the issues raised by the FNPRM. Now that an industry consensus has been reached, ANS looks forward to prompt Commission adoption of the Compromise Plan.

Respectfully submitted,

ALCATEL NETWORK SYSTEMS, INC.

A handwritten signature in black ink, appearing to read 'R. J. Miller', written over a horizontal line.

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Dated: June 11, 1993

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CERTIFICATE OF SERVICE

I do hereby certify that copies of the foregoing Comments on Alcatel Compromise Plan will be served by first class mail, postage paid, on the following parties on the 11th day of June, 1993:

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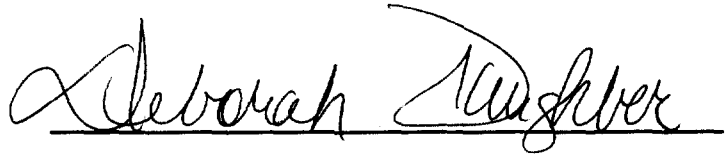
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June 11, 1993

* By Hand Delivery on June 14, 1993
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